

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Provision of Access )  
for 800 Service )

CC Docket No. 86-10

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FEDERAL COMMUNICATIONS COMMISSION  
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AT&T'S APPLICATION FOR REVIEW

Pursuant to Section 1.115 of the Commission's Rules, 47 C.F.R. § 1.115, AT&T Corp. ("AT&T") submits this Application for Review of the Common Carrier Bureau's Order on Reconsideration, DA 99-413, released on March 31, 1999. The Order on Reconsideration provides that requests submitted to the National Administration and Service Center ("NASC") administrator to change the Responsible Organization ("Resporg") for an inbound service cannot be verified by an independent third party, as permitted by the Commission's well-established primary interexchange carrier ("PIC") change procedures. The Bureau's Order fails to provide a reasoned explanation for its decision to change the Commission's policy that uniform procedures should be used to verify changes in a customer's outbound and inbound services.

INTRODUCTION

Toll free services, such as 800 service, are provided by means of databases containing information identifying the customer's service provider for the particular toll free telephone number. Only the Resporg can access a customer record in the databases and change those records to reflect the customer's toll free carrier selection, but a customer can designate any qualified entity as a Resporg, including an interexchange carrier ("IXC"). Changes in the

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databases' identification of a customer's ResporG can be accomplished on a ResporG-to-ResporG basis, or by the NASC at the request of the new ResporG. In its NASC Change Order, the Common Carrier Bureau "authorized the NASC administrator to make RESPORG changes, based on proper written authorization by users."<sup>1</sup>

MCI Telecommunications Corp. ("MCI") filed a petition in response to the NASC Change Order, requesting the Commission to clarify that the "proper written authorization" requirement could be satisfied by the Commission's PIC change procedures, including third party verification, or, in the alternative, to reconsider that Order and permit the use of PIC change procedures.<sup>2</sup> The Bureau conceded that "the *NASC Change Order* did not define 'proper written authorization,'"<sup>3</sup> but nonetheless stated, without elaboration: "we clarify that in our *NASC Change Order* the Bureau did not intend to allow PIC change procedures to be used for ResporG changes: we intended that all ResporG change authorizations be in writing."<sup>4</sup> The Bureau also declined to reconsider that interpretation, concluding that the NASC Change Order properly resolved that issue.<sup>5</sup> In effect, the Bureau decided that ResporG changes submitted to the NASC must be supported by a letter of authorization ("LOA") from a customer. However, there is no indication that the NASC Change Order intended to preclude the use of PIC change procedures

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<sup>1</sup> Provision of Access for 800 Service, CC Docket No. 86-10, 8 FCC Rcd 1844, 1845 (Com. Car. Bur. 1993)("NASC Change Order").

<sup>2</sup> See MCI "Petition For Clarification Or, In The Alternative, Reconsideration," dated April 29, 1993.

<sup>3</sup> Order on Reconsideration at ¶ 3.

<sup>4</sup> Id. at ¶ 6.

<sup>5</sup> Id.

to verify Resporg changes submitted to the NASC, and the Bureau did not provide any reasoned explanation for refusing to permit carriers to use the Commission's PIC change procedures.

More than six years have elapsed since the release of the NASC Change Order, and in that intervening period Resporgs have used PIC change procedures, including third party verification, in submitting service changes to the NASC, believing this to be consistent with the requirements of that Order and Commission policy. Those procedures have worked smoothly and without controversy to the benefit of customers. The Bureau has now suddenly issued a decision that finds those settled industry practices are not in the public interest and introduces a new and unnecessary requirement that will greatly inconvenience and burden the thousands of customers each month that wish to change inbound service providers by requiring them to sign LOAs. Significant numbers of these customers will neglect or decline to sign LOAs and will be unable to change inbound service providers, and those customers that eventually sign LOAs will experience substantial delays in changing their services. The Bureau's Order ignores these consequences and provides no reasoned explanation for changing Commission policy and reversing industry practices. As explained below, the Bureau's Order is fatally infirm and should be reversed.

### ARGUMENT

Customers have the identical interest in conveniently and efficiently changing their inbound and outbound service providers. For this reason, the Commission has adopted standard procedures that carriers must use in verifying those customer decisions. In its PIC Change Order, the Commission developed a comprehensive set of procedures, including third party verification, governing the submission by IXC's of PIC change requests to local exchange

carriers (“LECs”).<sup>6</sup> The Commission observed that “these verification options will significantly benefit customers without imposing undue costs on carriers.”<sup>7</sup> The Commission released its PIC Change Order on January 9, 1992, more than a year before the issuance of its NASC Change Order on March 10, 1993.

In its recent Slamming Order, the Commission decided to “apply the same verification requirements to in-bound and out-bound calls,” concluding that “[t]his will enable carriers to adopt uniform verification requirements for all calls” initiated by customers to change service providers.<sup>8</sup> The Commission decided that “uniform application of the verification requirements to all in-bound and out-bound calls will decrease customer confusion about what to expect when making changes to their telecommunications services.”<sup>9</sup> AT&T supported this decision and “announced its intention to require third party verification of all telemarketing sales, including those generated by in-house calls.”<sup>10</sup> Thus, AT&T decided to use the same third party

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<sup>6</sup> Policies and Rules Concerning Changing Long Distance Carriers, 7 FCC Rcd 1038, 1045-46 (1992)(“PIC Change Order”). The Commission required that IXCs employ one of four confirmation procedures before submitting the PIC changes: (1) the customer’s written confirmation; (2) the customer’s electronic authorization; (3) third party verification of the customer’s order; or (4) sending an information package to the customer confirming the telemarketing order.

<sup>7</sup> Id. at 1045.

<sup>8</sup> Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Second Report and Order and Notice of Proposed Rulemaking, CC Docket No. 94-129, FCC 98-334, rel. Dec. 23, 1998, at ¶ 67 (“Slamming Order”). The Slamming Order also eliminated the information package verification option the Commission adopted in its PIC Change Order. See 47 C.F.R. § 64.1150.

<sup>9</sup> Id. at ¶ 66.

<sup>10</sup> Id. at ¶ 63, n.202.

verification procedures to confirm the customer's decision to change its inbound and outbound service carrier.

The industry has effectively adopted the Commission's PIC change procedures for the purpose of verifying changes to a customer's inbound service made on a Resporg-to-Resporg basis, as the Declaration of Jonnie Bond appended hereto explains.<sup>11</sup> Ms. Bond observes that, since 1993, Resporgs have used one or more validation procedures, including written authorization, electronic authorization, and third party verification. These procedures correspond to the verification procedures the Commission approved in its PIC Change Order. Ms. Bond also notes that, although most Resporg changes are accomplished on a Resporg-to-Resporg basis, Resporgs use the NASC (now called the SMS/800 Help Desk) to implement Resporg changes in cases where the incumbent Resporg improperly rejects a change request without adequate justification or delays or refuses to release Resporg control.<sup>12</sup> The vast majority of IXC's and LEC's process acquiring Resporgs' third party verified forms on a cooperative Resporg-to-Resporg basis. However, a small number of local exchange carriers do not honor Resporg changes confirmed by third party verification, and in those cases AT&T must use the NASC to process the Resporg change.<sup>13</sup>

As Ms. Bond observes, AT&T markets inbound and outbound services to small business customers primarily through telemarketing, and uses the same verification procedures --

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<sup>11</sup> Declaration of Jonnie Bond, Exhibit A.

<sup>12</sup> Bond Decl. at ¶¶ 3, 4.

<sup>13</sup> Id. at ¶ 5. Bell Atlantic-North (the former Nynex), Pacific Bell, GTE and U S WEST do not accept third party verification for Resporg changes despite the fact that the rest of the industry does. This result is particularly peculiar in the cases Bell Atlantic-North and Pacific Bell, since their affiliated companies -- Bell Atlantic-South and Southwestern Bell -- routinely honor third party verification for Resporg changes submitted to them by an acquiring Resporg.

i.e., third party verification -- to confirm those telemarketing sales. The thousands of customers each month that purchase inbound services through telemarketing expect and desire a paperless transaction. It would be significantly inconvenient and burdensome for these customers to sign an LOA following third party verification of their telemarketing purchase, and significant numbers of these customers would either decline or neglect to sign LOAs.<sup>14</sup> Indeed, the Commission found in its PIC Change Order that “carriers have had little success in having customers return the LOA, and it tends to discourage competition.”<sup>15</sup> But the failure of these customers to sign LOAs would prevent them from changing their services, even though that is their desire and their decisions have been confirmed by third party verification. The LOA requirement would also lead to substantial delays in changing customers’ inbound services because, following a customer’s decision to purchase an inbound service and third party verification of that decision, time would be consumed in completing the LOA process. Finally, the LOA requirement would needlessly increase the costs of AT&T and other carriers that use third party verification procedures.<sup>16</sup>

The Commission’s PIC change procedures, including third party verification, are uniformly used to confirm a customer’s carrier selection, and for Resporg changes implemented on a Resporg-to-Resporg basis. If the PIC change procedures satisfy the Commission’s concerns in all those contexts, those procedures should equally satisfy the same concerns in the case of Resporg changes submitted to the NASC. However, the Order on Reconsideration provides no reasoned explanation for its conclusion that the “proper written authorization” requirement of the

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<sup>14</sup> Id. at ¶ 6.

<sup>15</sup> PIC Change Order, 7 FCC Rcd at 1045.

<sup>16</sup> Bond Decl. at ¶ 7.

NASC Change Order cannot be satisfied by the Commission's PIC change procedures and can only be satisfied by the use of LOAs. The Bureau's interpretation is not supported by the language of the NASC Change Order, which is silent with respect to the definition of "proper written authorization," as the Bureau concedes.<sup>17</sup> And contrary to the Bureau's assertion, the NASC Change Order did not endorse that interpretation<sup>18</sup> since, as the Bureau admits, that Order was silent on that issue.

The Bureau's interpretation of the "proper written authorization" requirement of the NASC Change Order indeed conflicts with the Commission's decision in the PIC Change Order issued more than a year before that Order to reject exclusive reliance on LOAs and to afford carriers a variety of options in verifying a customer's decision to change carriers.<sup>19</sup> The Commission's PIC Change Order represented the Commission's settled policy view concerning the verification procedures carriers should follow and the Bureau had no basis for concluding that the NASC Change Order intended to adopt a different verification procedure in the case of Resporg changes submitted to the NASC. The Slamming Order recently confirmed that the Commission has decided to "apply the same verification requirements to in-bound and out-bound calls."<sup>20</sup>

The Bureau's Order also conflicts with the Commission's policy, since toll free numbers became portable in 1993, to defer to the industry to solve implementation and operational issues associated with managing the toll free number resource, including Resporg

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<sup>17</sup> Order on Reconsideration at ¶ 3.

<sup>18</sup> Id. at ¶ 6.

<sup>19</sup> PIC Change Order, 7 FCC Rcd at 1045-46.

<sup>20</sup> Slamming Order at ¶ 67.

matters. The Commission has elected to intervene only to the limited extent necessary to assist in conserving toll free numbers and minimizing premature number exhaustion.<sup>21</sup> The Bureau should have followed that policy in this case. However, by insisting that the “proper written authorization” requirement cannot be satisfied by the Commission’s PIC change procedures, the Bureau adopted a new verification rule and changed Commission policy, but without providing a reasoned explanation.

The Bureau’s action thus suffers from the same infirmities as an earlier Commission Order excluding promotional rates from its price cap rules, that the U.S. Court of Appeals for the D.C. Circuit reversed. In that case, the Commission issued an order “clarifying” a previous order in deciding that promotional offerings should be excluded from price cap index calculations. The Court concluded that the Commission’s action did not constitute clarification, but rather a policy change in the treatment of promotional rates for which it failed to give a reasoned explanation.<sup>22</sup> Similarly, in this case, in clarifying that the NASC Change Order intended to preclude the use of PIC change procedures, the Order on Reconsideration effectively adopted a new verification rule and did not offer a reasoned explanation for that decision. In all other circumstances involving changes to a customer’s inbound and outbound services, the Commission’s PIC change procedures apply. It was therefore incumbent on the Bureau to explain why it decided that those procedures do not serve the public interest in the context of Resporg changes submitted to the NASC, in creating an exception to the Commission’s policy of “apply[ing] the same verification requirements to in-bound and out-bound calls.”<sup>23</sup> However, the

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<sup>21</sup> See Toll Free Service Access Codes, 12 FCC Rcd 11162 , 11168, 11176 (1997).

<sup>22</sup> American Tel. & Tel. Co. v F.C.C., 974 F.2d 1351, 1354-55 (D.C. Cir. 1992).

<sup>23</sup> Slamming Order at ¶ 67.



Bureau offered no such explanation. Accordingly, the Commission should conclude that the Bureau's Order is arbitrary and unsupported.<sup>24</sup>

CONCLUSION

For the reasons stated above, the Commission should grant AT&T's Application for Review of the Common Carrier Bureau's Order on Reconsideration.

Respectfully submitted,

AT&T CORP.

By: Peter H. Jacoby  
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Peter H. Jacoby  
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April 30, 1999

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<sup>24</sup> Motor Vehicles Mfrs. Ass'n v. State Farm Mut. Auto Ins. Co., 463 U.S. 29 (1983).

**EXHIBIT A**

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Before the  
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In the Matter of	)	
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for 800 Service	)	
	)	

DECLARATION OF JONNIE BOND

I, Jonnie Bond, declare as follows:

1. I, Jonnie Bond, am the Toll-Free Service Product Manager at AT&T Corp. in Bedminster, New Jersey. My responsibilities focus primarily on toll-free service policy matters, SMS/800 issues and industry-level issues. I have been employed by AT&T for 25 years. I frequently handle Responsible Organization ("Resporg") toll-free number portability matters on behalf of AT&T, and interact with other carriers and Resporgs to resolve inter-company Resporg and toll-free number problems and disputes.

2. I also represent AT&T on the industry SMS/800 Number Administration Committee ("SNAC") of the ATIS-sponsored Ordering and Billing Forum ("OBF"). I have served on the SNAC and its predecessor CLC Ad Hoc 800 Database Committee, for 6 years. I actively participate in the SNAC efforts to draft and amend, from time to time, the Industry Guidelines For Toll Free Number Administration ("Industry Guidelines"), which provide the industry with a set of working principles for the administration of toll-

free numbers, including the implementation of toll-free number portability through the Resporg change process.

3. Since 1993, the industry has acknowledged that Resporg change validation procedures are within the discretion of the individual Resporg and that Resporgs can use one or more validation procedures: written LOA, third party verification, or electronic verification. The industry selected these validation options because they reflect the procedures specified by the Federal Communications Commission ("FCC") concerning changing a customer's preferred carrier, and because Resporg changes are typically made at the same time that preferred carrier changes are made. The CLC Ad Hoc Database Committee memorialized these validation options in Issue Number 048 on May 18, 1993. See Exhibit 1 attached to my Declaration.

4. The Industry Guidelines set forth the procedures that Resporgs must use in implementing Resporg changes between the acquiring and incumbent Resporgs. Most Resporg changes are implemented through direct Resporg-to-Resporg interactions. The Industry Guidelines also provide that the National Administration and Service Center ("NASC"), now called the SMS/800 Help Desk, can implement Resporg changes on behalf of the acquiring Resporg, if the acquiring Resporg has verified the legitimacy of the customer's request. Industry Guidelines, Section 3.2, Ex. 2. See Exhibit 2 attached to my Declaration.

5. It has been a widespread industry practice to implement Resporg changes using third party verification since toll-free number portability was implemented in 1993. The vast majority of interexchange carriers and local exchange carriers honor Resporg

changes confirmed by third party verification. But a small number of local exchange carriers do not honor Resporg changes confirmed by third party verification -- i.e., Pacific Bell, GTE, U S WEST and Bell Atlantic--North (former Nynex territory) -- even though the rest of the industry accepts the use of third party verification for Resporg changes submitted by an acquiring Resporg. AT&T typically uses the NASC to implement Resporg changes where the incumbent Resporg improperly rejects a change request or delays or refuses to release Resporg control.

6. AT&T markets services to small business customers primarily through telemarketing and uses the same third party verification procedures to confirm customers' decisions to change their outbound preferred carrier and their inbound service carrier implemented by Resporg changes. Those procedures comply with the FCC's rules concerning preferred carrier changes. When Resporg changes are requested, the telemarketing script captures the customer's consent to change the Resporg for specified toll-free number(s).

7. It would be significantly dissatisfying to customers who have requested a Rersporg change, validated by third party verification, to be subsequently asked to confirm the request by signing a letter of authorization ("LOA"). Customers purchasing inbound services through telemarketing normally expect and want a simple, efficient paperless arrangement. Requiring a signed LOA following every third party verification of a Resporg change would run counter to customers' expectations and would significantly inconvenience them, and many customers would simply decline or neglect to sign the required LOAs. As a result, the LOA requirement would dissuade many

customers from changing their inbound service carrier. The LOA requirement would also delay the transfer of customers' services to AT&T since time would be required for the completion and submission of LOAs following the telemarketing sale and third party verification of the customer's decision. LOAs are also no more reliable than third party verification of customer consents. Finally, because LOAs are redundant in view of the third party verification procedures AT&T employs, a requirement to use LOAs would substantially increase AT&T's costs.

I declare under penalties of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 7/30/99

Jonnie Bond  
Jonnie Bond

**ATTACHMENT 1**

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## CLC Ad Hoc 800 Database Committee Issue Identification Form

**ISSUE TITLE:** RESP ORG Change Verification  
Procedures

**ISSUE NUMBER:** 048  
**DATE SUBMITTED:** 03-23-93  
**LAST REVISION DATE:** 05-18-93  
**INITIAL CLOSURE DATE:** 04-21-93  
**FINAL CLOSURE DATE:** 05-18-93

**1. ISSUE STATEMENT:** The industry should define what vehicles may be used to verify a customers request for a RESP ORG change. With present verification procedures for outbound changes currently defined similar multi-function tools should be adopted for 800 service changes.

**2. SUGGESTED RESOLUTION OR OUTPUT PRODUCT/SERVICE DESIRED:**  
Adopt procedures for verification into guidelines that allow for multiple RCA request vehicles. To be done by adopting existing outbound PIC changes procedures for inbound sales. To include: 1) LOA, 2) Negative Verification, 3) TPV and 4) Electronic Verification. TPV = Third Party Verification, LOA = Letter of Agency.

**3. OTHER IMPACTS:**

**4. ISSUE ORIGINATOR (CHAMPION):**

**NAME:** David Heath  
**COMPANY:** MCI  
**ADDRESS:** 2400 Glenville  
Richardson, TX 75082

**TELEPHONE NO.:** 214-918-5624  
**FAX NO.:** 214-918-6031

**5. ISSUE STATUS:**  
03-23-93 Accepted and tabled pending FCC ruling on Allnet petition.  
04-21-93 This issue was moved from Tabled to Active Status and then to Initial Closure.  
05-18-93 This issue is moved to Final Closure.

**6. RESOLUTION:**  
Validation Procedures are RESP ORG specific. Use of these procedures is defined between a RESP ORG and its customer or customer's agent. Validation procedures may include but are not limited to the following:  
1) LOA, 2) Negative Verification, 3) TPV and 4) Electronic Verification.

**ATTACHMENT 2**



Ordering and Billing  
Forum

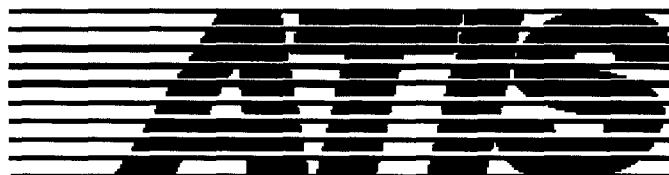
**ATIS/OBF-TFG-011**

**INDUSTRY GUIDELINES  
FOR TOLL FREE  
NUMBER  
ADMINISTRATION**

**Issue 11**

**January 1999**

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This document was originally developed by the Ad Hoc 800 Database Committee, a committee under the auspices of the Carrier Liaison Committee and sponsored by the Alliance for Telecommunications Industry Solutions (ATIS). The document has been modified and is now maintained by the SMS/800 Number Administration Committee (SNAC) of the ATIS Ordering and Billing Forum (OBF). The OBF provides a forum for customers and providers in the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connectivity and related matters. The SNAC is responsible for identifying and incorporating the necessary changes into this document. All changes to this document shall be made through the OBF issue resolution process and adopted by the SNAC as set forth in the OBF Guidelines.

This document is maintained and exclusively distributed by ATIS under the direction of the OBF.

**Note:** FCC Order 97-123, adopted April 4, 1997, permanently codified certain portions of this document particular to the assignment and utilization of ten digit toll free number administration (Section 2) in order to address Industry concerns related to the premature exhaust of the Toll Free Numbering Resource. Readers are advised to review and understand the implications of these FCC Orders and pay attention to the future FCC Orders that may impact the information provided in this document.

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### **3. Coordinated Conversion of Toll Free Service**

#### **3.1 Preface**

This section describes the process that enables a Toll Free Service End-User Subscriber to retain the use of an active, reserved, or assigned Toll Free Service number when changing Responsible Organizations (Resp Orgs), and potentially, Toll Free Service Provider(s). This section outlines the responsibilities of the Customer, the Resp Org, and the Toll Free Service Provider(s).

#### **3.2 Change of Resp Org**

**NOTE: A change of Resp Org should not be confused with changes to the Toll Free Service(s) of Toll Free Service Provider(s). It is the responsibility of the customer to separately advise its Toll Free Service Provider(s) of any proposed changes to the Toll Free Service(s) (i.e., change of Resp Org only, conversion to Multiple Carrier, disconnection of service).**

**3.2.1** Responsibilities of the Customer: To change its Resp Org, the Customer should:

- Establish a business relationship with the new Resp Org and provide appropriate documents as required by the new Resp Org for managing the SMS/800 record.
- Notify the new Resp Org of the requested date for the Resp Org change to occur.
- Notify the current Resp Org of the effective date to terminate the business relationship for managing the SMS/800 record for a Toll Free number.

**3.2.2** Responsibilities of the new Resp Org: The responsibilities of the new Resp Org are to:

- Establish a business relationship with the Customer for Resp Org management of the SMS/800 record, and confirm with the Customer the Customer's obligation to define the Toll Free Service requirements directly to the Toll Free Service Provider(s).
- Obtain the necessary information from the Customer to assume SMS/800 record management. This information includes the Toll Free number and the requested effective date of the Resp Org change.
- Implement, in a timely manner, all Customer-requested changes to the SMS/800 record to support the Customer's Toll Free Service.

**3.2.3** Responsibilities of the current Resp Org: When the Customer requests a change of Resp Org, it is the responsibility of the current Resp Org to:

- Ensure that it has, from the Customer, the information necessary to validate the request and transfer management of the SMS/800 record to the new Resp Org. The transfer information includes, but is not limited to: the identity of the new Resp Org, the Toll Free number, and the requested date of transfer.

- Validate the change of Resp Org request against internal Customer information to ensure the request has been authorized by the Customer. A Customer's name may be compared to multiple sources internally that may include the following examples:
  - Service Address Name
  - Billing Address Name
  - Does Business As (DBA) information
  - Additional Listing information

Additionally, the Resp Org may validate address information on the change of Resp Org request against internal Customer address information. A Customer's address may be compared to multiple sources internally that may include the following examples:

- Service Address
- Billing Address

When an address has been matched, but no Customer name matches, the old Resp Org should attempt to contact its Customer to verify the information to complete the Resp Org change.

- When the internal Customer information reveals the probability that the Toll Free number is a Resold Toll Free Service, the current Resp Org should contact the Toll Free Service Reseller to validate the Toll Free Service End-User Subscriber information, and to confirm it is the only user of the Toll Free number.

When the new Resp Org acts on behalf of the Customer via written authorization to the old Resp Org, the following additional information is required:

- The Toll Free numbers that need to be transferred to the new Resp Org.
  - Customer name and address, requested date of change, contact name and telephone number, Customer authorized signature.
  - Date and time the written authorization is sent to the old Resp Org.
  - New Resp Org SMS/800 identification and new Resp Org contact number.
- Release management of the SMS/800 record by changing the record to reflect the new Resp Org. This change, according to the industry standardized counting interval (see note) should be made no later than two full business days after receipt of the change request (unless a later date is requested by the Customer), or the current Resp Org should communicate back to the Customer the reason the requested Resp Org change cannot be made.

Note: The industry agreed to adopt the following counting standards in order to establish a common expectation for completion of a Resp Org change request:

DAY 0    Receipt of Resp Org Change  
DAY 1    Clock Starts for Change Request  
DAY 2    Change Occurs by Close of Business  
DAY 3    New RO Can Expect Change in Place at Start of Business

Day 0 can be any day of the week, i.e., Sunday through Saturday  
Days 1,2, 3 must be a normal business day, i.e., Monday-Friday

\*Change Occurs by Close of Business of Control (Losing) Resp Org



(Changes that have been rejected and are resubmitted are considered as a new request, i.e., the counting interval begins again at the start of the new request.

- Assist the new Resp Org with any outstanding trouble conditions as outlined in Section 3.4.
- Advise the Customer of its inability to affect any further SMS/800 record management after completing the transfer of the specified record to another Resp Org.

### **3.2.4 Special Conditions**

XXX99 is an optional Resp Org ID that can be used to identify toll-free numbers that may warrant special consideration before a Resp Org change is requested. This Resp Org ID may be used to identify toll-free numbers involving special conditions, e.g:

- Shared/bundled services
- Fraudulent or unauthorized Resp Org change attempt
- Government directives/Court Orders

If the new Resp Org elects to request the SMS/800 Help Desk to make the Resp Org change, the new or requesting Resp Org is expected to validate the customer-signed Resp Org change request to ensure that the toll-free number is currently assigned to the end-user requesting the change and that the number is not subject to special considerations that may preclude its portability. This verification of end-user may be accomplished by:

- calling the toll-free number in question
- reviewing bill-copy that clearly indicates the current end-user subscriber of the toll-free number
- obtaining verification from the old Resp Org, or
- such other verification that clearly confirms that the customer requesting the Resp Org change is the current and valid end-user subscriber.

### **3.2.5 SNAC Standard Resp Org Change Request Information**

The following list of Resp Org Change Request information has been compiled by SNAC representatives of the industry. The purpose of this list is to provide common information between companies to enable an expedient Resp Org Change.

- Specific language that customer wants to change Responsible Organization
- Customer Name
- Customer Address / Alternate Address (optional)
- Customer Contact Name (printed)
- Customer Signature
- Customer Signature Date (must be less than 30 days)
- the Gaining Resp Org Id
- Gaining Resp Org Id contact information (address/fax/phone/contacts)
- Losing Resp Org Id
- Minimum of 10 spaces to enter Toll-free numbers